

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

Lupe Development Partners, LLC and Steven)	Case No. 21-cv-02668 (PAM/DTS)
Minn,)	
)	
Plaintiffs,)	
)	
vs.)	
)	
Fred Deutsch, Deutsch Development Corp.,)	
Pacific Flats I LLC, and Pacific Flats II LLC,)	
)	
Defendants.)	
)	

RULE 7.1(a) MEET AND CONFER STATEMENT

I, Thomas G. Wallrich, hereby certify that Plaintiffs engaged in communications with Defendant Fred Deutsch and counsel for Third-Party Penny Baird regarding Plaintiffs' proposed deposition of the Scher Law Firm, LLP . The parties do not agree on any part of the resolution of this motion.

Dated: June 12, 2024

COZEN O'CONNOR

By: /s/ Thomas G. Wallrich
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